

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA, )  
                                )  
Plaintiff,                 )  
                                )  
vs.                         )              Case No. 20-cv-13293  
                                )  
INTERNATIONAL UNION, UNITED )  
AUTOMOBILE, AEROSPACE, AND )  
AGRICULTURAL IMPLEMENT WORKERS )  
OF AMERICA,                 )              Hon. David M. Lawson  
                                )  
Defendant.                 )

**UNOPPOSED MOTION TO WITHDRAW AS COUNSEL FOR THE UAW  
AND BRIEF IN SUPPORT**

Certain outside counsel for Defendant International Union, United Automobile, Aerospace, and Agricultural Implement Workers of America (“UAW”), attorneys Terence H. Campbell and Eric S. Pruitt, and the law firm of Cotsirilos, Tighe, Streicker, Poulos & Campbell, respectfully move the Court to enter an Order granting them leave to withdraw from the representation of Defendant UAW pursuant to this Unopposed Motion. In support of this Unopposed Motion, movants states as follows:

1. This case involves a civil consent decree which fully resolved a years-long criminal investigation by the U.S. Attorney’s Office with no criminal charges against the UAW.
2. Attorneys Terence Campbell and Eric Pruitt of the law firm of Cotsirilos, Tighe, Streicker, Poulos & Campbell (“Attorneys”) have appearances on file on behalf of Defendant UAW in this case.
3. The UAW’s newly-elected president recently informed Attorneys that the UAW no longer wishes to have Attorneys represent the UAW in ongoing matters and directed Attorneys to

cease their representation of the UAW, including in this case.

4. Per the communication from the newly-elected UAW president, it is Attorneys' understanding that the UAW has retained, or is retaining, new outside counsel to represent it in open matters.
5. Given that Attorneys have not been actively representing the UAW in this matter for some time already, and given the fact that we understand the UAW has retained new outside counsel to represent it in open matters, allowing Attorneys to withdraw here will not prejudice the UAW; and granting this unopposed motion is in accord with the client's (as conveyed by the newly-elected UAW president) wishes and direction.
6. In accord with Local Rule 7.1, movant Attorneys have communicated with counsel for the plaintiff in this matter, and the plaintiff has no objection to this Motion to Withdraw.

**WHEREFORE**, the movant Attorneys respectfully request the Court grant this Unopposed Motion and enter an Order granting Attorneys' request to withdraw their appearances on behalf of the UAW in this case.

Respectfully submitted,

/s/ Terence H. Campbell  
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**CERTIFICATE OF SERVICE**

I hereby certify that on June 28, 2023, this Unopposed Motion for Leave to Withdraw as Counsel for the UAW was electronically filed with the Clerk of the Court using the ECF System, which will provide electronic copies to counsel of record.

*/s/ Terence H. Campbell*  
Terence H. Campbell (Illinois Bar #6228959)